

1 Muriel B. Kaplan, Esq. (SBN 124607)
Michele R. Stafford, Esq. (SBN 172509)
2 Shaamini A. Babu, Esq. (SBN 230704)
SALTZMAN & JOHNSON LAW CORPORATION
3 44 Montgomery St., Suite 2110
San Francisco, CA 94104
4 (415) 882-7900
(415) 882-9287 – Facsimile
5 mkaplan@sjlawcorp.com
mstafford@sjlawcorp.com
6 sbabu@sjlawcorp.com

7 Attorneys for Plaintiffs

8
9
10 UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

11
12 GIL CROSTHWAITE, et al., as Trustees of the
OPERATING ENGINEERS HEALTH AND
13 WELFARE TRUST FUND FOR NORTHERN
CALIFORNIA, et al.,

14
15 Plaintiffs,
16 v.

17 JOLANDCO, INC.,
18 Defendant.

Case No.: C08-1560 MHP

**REQUEST FOR CONTINUANCE OF
CASE MANAGEMENT CONFERENCE
AND ORDER THEREON**

19 Plaintiffs herein respectfully request a Continuance of the Case Management Conference
20 currently on calendar for June 30, 2008.

21
22 1. Plaintiffs are currently in discussions with defendant to establish a payment plan
23 for all amounts owed by defendant to date, thereby resolving the matter. Plaintiffs have requested
24 that the plan be included in a Judgment Pursuant to Stipulation.

25 2. Upon execution of a Judgment Pursuant to Stipulation, plaintiffs will file it with the
26 court and request that the court to retain jurisdiction in the event of defendants' default.
27

3. Plaintiffs therefore respectfully request that the Case Management Conference, currently scheduled for June 30, 2008, be continued for approximately 60 days to allow the Judgment Pursuant to Stipulation to be signed and thereby bring this matter to resolution.

4. It is furthermore requested that all previously set deadlines and dates related to this case be continued as well.

I declare under penalty of perjury that I am the attorney for the plaintiffs in the above entitled action, and that the foregoing is true of my own knowledge.

Executed this 19th day of June, 2008, at San Francisco, California.

SALTZMAN & JOHNSON
LAW CORPORATION

By: _____/s/_____
Michele R. Stafford
Attorneys for Plaintiffs

IT IS SO ORDERED.

The currently set Case Management Conference is hereby continued to _____ at _____, and all previously set deadlines and dates related to this case are vacated, to be reset at that Conference.

Date: _____

United States District Court Judge

PROOF OF SERVICE

I, the undersigned, declare:

I am a citizen of the United States and am employed in the County of San Francisco, State of California. I am over the age of eighteen and not a party to this action. My business address is 44 Montgomery Street, Suite 2110, San Francisco, California 94104.

On June 19, 2008, I served the following document(s):

**REQUEST FOR CONTINUANCE OF
CASE MANAGEMENT CONFERENCE
AND ORDER THEREON**

on the interested parties in said action by placing a true and exact copy of each document in a sealed envelope with postage thereon fully prepaid, in a United States Post Office box in San Francisco, California, addressed as follows:

**Christopher D. Johnson
Authorized Agent for Service of Process
Jolandco, Inc.
9083 Foothills Blvd., Suite 350
Roseville, California 95747**

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed on this 19th day of June, 2008, at San Francisco, California.

_____/s/_____
Vanessa de Fábrega